

November 1, 2019

Ex Parte via ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Convo's Request for Clarification in *Structure and Practices of the Video Relay Service Program*, CG Docket No. 10-51; *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket No. 03-123

Dear Ms. Dortch:

I write to correct an error in the reply comments filed by CSDVRS, LLC, and Purple Communications, Inc., ("ZVRS") in the above proceeding.¹ In its reply comments, ZVRS claims that Sorenson Communications is asking the Commission to prohibit "the distribution of all service-related equipment other than its own bespoke VRS-only devices."² ZVRS further suggests that Sorenson is asking the Commission to prohibit the distribution of iPads, tablets, and laptops and states that Sorenson "asks the Commission to define only its competitor's practices as prohibited."³

That is incorrect. In its comments and reply comments, Sorenson argued that the Commission should clearly state—one way or the other—whether providers may freely distribute multi-use devices such as tablets, laptops, cell phones, and the NVIDIA Shield. Sorenson did not (and does not) take a position on whether these devices are service- or non-service-related.⁴ As Sorenson has previously explained, the Commission can state that these are:

¹ See Reply Comments of CSDVRS, LLC, and Purple Communications, Inc., CG Docket Nos. 10-51 and 03-123 (filed Oct. 15, 2019).

² *Id.* at 2.

³ *Id.* at 13.

⁴ See, e.g., Comments of Sorenson Communications LLC re Convo's Request for Clarification at 2, CG Docket Nos. 10-51 and 03-123 (filed Sep. 30, 2019) ("The Commission should correct this error by quickly clarifying what standard providers should use to determine whether equipment is service- or non-service-related. It should also quickly clarify how this test applies to the equipment already being distributed by providers—especially including multifunctional smart devices such as smartphones, iPads, laptops, and the NVIDIA SHIELD that are capable of running multiple applications."); Reply Comments of Sorenson

(1) not service-related and thus prohibited; (2) service-related and thus permitted; or (3) service-related under certain conditions and not service-related under other conditions.⁵ Sorenson's point is that the Commission should articulate the standard it is applying and should clearly state whether tablets, laptops, cell phones, and the NVIDIA Shield are service- or non-service-related. Doing so will ensure that all providers are playing by the same rules. Although it may be convenient for ZVRS to ascribe a different position to Sorenson, doing so is a mischaracterization.

Respectfully submitted,



Mark D. Davis

Counsel for Sorenson Communications LLC

cc: Eliot Greenwald
Michael Scott

Communications LLC re Convo's Request for Clarification at 5, CG Docket Nos. 10-51 and 03-123 (filed Oct. 15, 2019) ("Ultimately, the Commission must decide—once and for all—the status of the multi-use devices that providers are already giving away, including smartphones, tablets, laptops, and NVIDIA Shields.").

⁵ Letter from John T. Nakahata to Marlene H. Dortch, CG Docket Nos. 10-51, 03-123, at 2 (filed May 6, 2019).